

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
1) JHONNATHAN DELEON-BAYARDO,)
2) MANUEL INDA-GALAVIZ,)
3) RAMON AGUILAR-LIZAMA,)
4) HECTOR MARTINEZ-BUENO,)
a/k/a Saul Contreras)
Castro,)
)
Defendants.)

CR-07-99 JRT/SRN

INDICTMENT

(21 U.S.C. § 846)
(21 U.S.C. § 841(b)(1)(B))
(21 U.S.C. § 841(a)(1))
(21 U.S.C. § 853(a)(1))
(21 U.S.C. § 853(a)(2))
(18 U.S.C. § 2)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy - Heroin)

On or before February 28, 2007, in the State and District of
Minnesota and elsewhere, the defendants,

JHONNATHAN DELEON-BAYARDO,
MANUEL INDA-GALAVIZ,
RAMON AGUILAR-LIZAMA, and
HECTOR MARTINEZ-BUENO,
a/k/a Saul Contreras Castro,

knowingly conspired with each other and with other persons, whose
names are known and unknown to the Grand Jury, to possess with
intent to distribute 100 grams or more of a mixture and substance
containing a detectable amount of heroin, a controlled substance;
all in violation of Title 21, United States Code, Sections 846 and
841(b)(1)(B).

SCANNED

MAR 27 2007

U.S. DISTRICT COURT Mpls

FILED MAR 27 2007
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTERED _____
DEPUTY CLERK'S INITIALS _____

U.S. v. Jhonnathan Deleon-Bayardo, et al.

COUNT 2

(Possession With Intent To Distribute - Heroin)

On or before February 28, 2007, in the State and District of Minnesota, the defendants,

**JHONNATHAN DELEON-BAYARDO,
MANUEL INDA-GALAVIZ,
RAMON AGUILAR-LIZAMA, and
HECTOR MARTINEZ-BUENO,
a/k/a Saul Contreras Castro,**

each aiding and abetting the other, knowingly and intentionally possessed with the intent to distribute approximately 160 grams of a mixture and substance containing a detectable amount of heroin, a controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATIONS

Counts 1 and 2 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Sections 853(a)(1) and (2).

As a result of the foregoing offenses, defendants shall forfeit to the United States any and all property constituting or derived from any proceeds defendants obtained directly or indirectly as a result of the violations and any and all property used or intended to be used in any manner or part to commit and to

facilitate the commission of the violations alleged in Counts 1 and 2 of this Indictment.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), 846 and 853(a)(1) and (2).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON